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Attorneys for Petitioners

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**CIMC RAFFLES OFFSHORE (SINGAPORE))
LIMITED AND YANTAI CIMC RAFFLES)
OFFSHORE LIMITED,)**

Petitioners,

v.

**SCHAHIN HOLDING S.A., SCHAHIN)
ENGENHARIA S.A., SEA BISCUIT)
INTERNATIONAL INC., BLACK GOLD)
DRILLING LLC, BAERFIELD DRILLING)
LLC AND SORATU DRILLING LLC,)**

Respondents.

13 Civ. 0052 (JSR)
ECF Case

**NOTICE OF MOTION FOR ALTERNATIVE SERVICE ON FOREIGN
RESPONDENTS**

PLEASE TAKE NOTICE THAT, Petitioners, by their undersigned attorneys, hereby move, pursuant to the Federal Rules of Civil Procedure 4(f)(3), for service of Summons, Petition to Confirm a Foreign Arbitration Award and for an Entry of Judgment, Memorandum of Law in

Support of Petition to Confirm a Foreign Arbitration Award and for Entry of Judgment, David W. Rivkin Declaration dated January 2, 2013 and Supplemental Declaration of Nwamaka G. Ejebe dated February 14, 2013, no later than March 18, 2013:

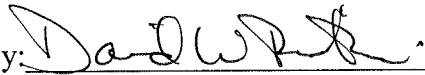
1. On Respondents Schahin Holding S.A. (“Schahin Holding”), Schahin Engenharia S.A. (“Schahin Engenharia”):
 - (a) By hand delivery on Mr. Paul Hessler and Mr. Michael Basset at Linklaters LLP, 1345 Avenues of Americas 19th Floor, New York, NY 10105;
 - (b) By Federal Express to Rua Vergueiro, No. 2009, 9th Floor, 04101-905 - São Paulo - S.P. – Brazil, Attn: Salim Taufic Schahin and Milton Taufic Schahin; and Rua Vergueiro, No. 2009, 5th floor, 04101-905 - São Paulo - S.P. – Brazil, Attn: Mr. João Alves Meira Neto; and
 - (c) By email to Salim Taufic Schahin (sschahin@schahin.com.br), Mr. João Alves Meira Neto (jmeira@schahin.com.br) and Fernando Schahin (fschahin@schahin.com.br);
2. On Sea Biscuit International Inc. (“Sea Biscuit”) by hand delivery on Mr. Paul Hessler and Mr. Michael Basset at Linklaters LLP, 1345 Avenues of Americas 19th Floor, New York, NY 10105.

Pursuant to a conference held on March 4, 2013, Petitioners shall transmit and file this motion on Schahin Holding, Schahin Engenharia and Sea Biscuit on or before March 6, 2013. Schahin Holding, Schahin Engenharia and Sea Biscuit are ordered by the Court to respond to this motion on or before March 11, 2013 at 9:00am. The Honorable Jed S. Rakoff, United States District Judge, will hear oral argument on this issue on March 11, 2013 at 9:00 am in Courtroom 14-B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York.

Respectfully submitted,

Dated: New York, New York
March 6, 2013

DEBEVOISE & PLIMPTON LLP

By: 
David W. Rivkin
dwrivkin@debevoise.com
Nwamaka Ejebe (Not admitted in the SDNY)
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**SCHAHIN HOLDING S.A., SCHAHIN)
ENGENHARIA S.A., SEA BISCUIT)
INTERNATIONAL INC., BLACK GOLD)
DRILLING LLC, BAERFIELD DRILLING)
LLC AND SORATU DRILLING LLC,)**

Respondents.

**[PROPOSED] ORDER FOR ALTERNATIVE SERVICE ON FOREIGN
RESPONDENTS**

Whereas, on December 26, 2012, an arbitral tribunal rendered a final arbitration award in favor of Petitioners CIMC Raffles Offshore (Singapore) Limited and Yantai CIMC Raffles Offshore Limited (collectively, “CIMC Raffles”) and against Respondents.

Whereas, on January 2, 2013, CIMC Raffles filed the petition (“Petition”) to confirm the final arbitration award and enter it as judgment.

Whereas, on January 23, 2013, Co-Respondents Baerfield Drilling LLC (“BDL”), Soratu Drilling LLC (“SDL”) and Black Gold Drilling LLC (“Black Gold”) were properly served with the Petition and a Summons.

Whereas, Co-Respondents BDL, SDL and Black Gold have the same directors as Respondents Schahin Holding S.A. (“Schahin Holding”), Schahin Engenharia S.A. (“Schahin Engenharia”) and Sea Biscuit International Inc. (“Sea Biscuit”).

Whereas, in a letter dated January 30, 2013, CIMC Raffles furnished Respondents Schahin Holding, Schahin Engenharia and Sea Biscuit with a request for waiver of service of process.

Whereas Schahin Holding, Schahin Engenharia and Sea Biscuit are long-standing clients of Linklaters LLP, and the law firm continues to represent these Respondents in legal proceedings in the United States and the United Kingdom.

Whereas, Paul Hessler of Linklaters LLP served as counsel to Schahin Holding, Schahin Engenharia and Sea Biscuit in the underlying arbitration and remains in contact with these Respondents.

IT IS HEREBY ORDERED that, pursuant to Rule 4(f)(3), 4(h)(2) of the Federal Rules of Civil Procedure, no later than March 18, 2013, CIMC Raffles shall serve:

1. Schahin Holding and Schahin Engenharia:

- (a)** By hand delivery on Mr. Paul Hessler and Mr. Michael Basset at Linklaters LLP, 1345 Avenues of Americas 19th Floor, New York, NY 10105
- (b)** By Federal Express to Rua Vergueiro, No. 2009, 9th Floor, 04101-905 - São Paulo - S.P. – Brazil, Attn: Salim Taufic Schahin and Milton Taufic Schahin; and Rua Vergueiro, No. 2009, 5th floor, 04101-905 - São Paulo - S.P. – Brazil, Attn: Mr. João Alves Meira Neto; and
- (c)** By email to Salim Taufic Schahin (sschahin@schahin.com.br), Mr. João Alves Meira Neto

(jmeira@schahin.com.br) and Fernando Schahin
(fschahin@schahin.com.br);

2. Sea Biscuit by hand delivery on Mr. Paul Hessler and Mr. Michael Basset at Linklaters LLP, 1345 Avenues of Americas 19th Floor, New York, NY 10105.

SO ORDERED:

Dated: New York, NY
March __, 2013

JED S. RAKOFF, U.S.D.J.